



April 10, 2015

Central Valley Regional Water Quality Control Board
1685 E Street
Fresno, California 93706
Attn: Mr. Dale Harvey, Senior Engineer

Re: Written Comment – Tentative Waste Discharge Requirements for The Wine Group, Inc. – Golden State Vintners, D.B.A. Franzia-McFarland Winery – Kern County

Mr. Harvey,

On behalf of The Wine Group, Inc. (TWG), included herein are written comments in response to the Tentative Waste Discharge Requirements (TWDR) as prepared for the Golden State Vintners d.b.a Franzia-McFarland Winery (the Facility) and released for public comment on March, 20 2015. TWG would also like to express gratitude to the Central Valley Regional Water Quality Control Board (RWQCB) and to all Staff members for their cooperation and communication through the permitting process.

- 1) The draft Monitoring and Reporting Program (MRP) included within the TWDR currently requires monthly grab samples to be collected for the purpose of effluent monitoring of both EFF-001 and EFF-002 for the following constituents: biochemical oxygen demand (BOD), total dissolved solids (TDS), fixed dissolved solids (FDS), nitrate as nitrogen, nitrite as nitrogen, ammonia as nitrogen, and Total Kjeldahl Nitrogen (TKN). Additionally, the MRP requires a grab sample on a quarterly basis of both EFF-001 and EFF-002 for analysis of the listed general minerals.

The Facility currently utilizes a composite auto-sampler for the collection of effluent samples for EFF-001 and would like to request that the draft MRP be changed to reflect this method of sample collection for the above listed constituents at this monitoring location. Effluent monitoring samples of EFF-002 will continue to be collected as grab samples for the above listed constituents as indicated in the draft MRP.

- 2) The TWDR currently lists in Land Application Area Specifications D.4. a BOD cycle loading of 100 lbs/acre/day for both LAA-001 and LAA-002. The Facility would like to request a provision to this Specification that should wastewater effluent from

EFF-001 and EFF-002 be applied to the approved current or future extent of LAA-001 and LAA-002 via sprinkler/water cannon irrigation instead of flood irrigation, the BOD cycle loading rate be increased to 150 lbs/acre/day in the area of, and for the duration of that application cycle.

On behalf of TWG and the Facility, I would like to thank the RWQCB for allowing for the submittal of and consideration of the comments included herein. Should the RWQCB require clarification or additional information pertaining to these comments, please contact me at kyle.schmidt@thewinegroup.com / o: (209) 599-0451 / c: (225) 326-3228.

Thank you for your consideration in this matter,



Kyle Schmidt
Director of Environmental Services
The Wine Group
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cc: Scott Hatton, RWQCB
California RWQCB, Rancho Cordova, CA